

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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In the Matter of the Search Regarding No. 4:25-mj-63

25-063-04

**REDACTED APPLICATION  
FOR SEARCH WARRANT**

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I, Special Agent Craig Scherer, being duly sworn depose and say:

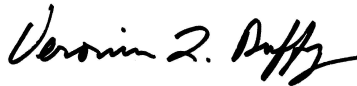
1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations in Sioux Falls, South Dakota, and make this application for information about the location of the cellular telephone fully described in Attachment A, attached hereto and incorporated herein by reference (the "Target Cell Phone"), whose service provider is Cellco Partnership, dba Verizon Wireless, Inc., a wireless telephone service provider, headquartered at 180 Washington Valley Road, Bedminster, NJ 07921 (the "Service Provider"). The location information to be seized is described in Attachment B, attached hereto and incorporated herein by reference.

2. I have reason to believe that within certain property, namely: that fully described in Attachments A, attached hereto and incorporated herein by reference, there is now concealed certain information, namely: that fully described in Attachment B, attached hereto and incorporated herein by reference, which I believe is property constituting evidence of the commission of criminal offenses, contraband, the fruits of crime, or things otherwise criminally possessed, or property designed or intended for use or which is or has been used as the means of committing criminal offenses, concerning violations [REDACTED].

3. The facts to support a finding of probable cause are contained in my Affidavit filed herewith.

  
\_\_\_\_\_  
Special Agent Craig Scherer  
Homeland Security Investigations

Subscribed and sworn to before me, telephonically, on the 14<sup>th</sup> day of March 2025, at Sioux Falls, South Dakota.

  
\_\_\_\_\_  
VERONICA L. DUFFY  
United States Magistrate Judge

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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In the Matter of the Search Regarding No. 4:25-mj-63

25-063-04

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**REDACTED SEARCH WARRANT**

TO: ANY AUTHORIZED LAW ENFORCEMENT OFFICER

An application by a federal law enforcement officer or an attorney for the government requests the search for information about the location of the cellular telephone fully described in Attachment A, attached hereto and incorporated herein by reference (the "Target Cell Phone"), whose service provider is Celco Partnership, dba Verizon Wireless, Inc., a wireless telephone service provider headquartered at 180 Washington Valley Road, Bedminster, NJ 07921 (the "Service Provider"), regarding violation of [REDACTED]. The location information to be provided is described in Attachment B, attached hereto and incorporated herein by reference,

To the extent that the information described in Attachment B (hereinafter, "Location Information") is within the possession, custody, or control of Service Provider, Service Provider is required to disclose the Location Information to the government beginning the date of issuance of the search warrant, until 30 days from the date of issuance of the search warrant.

In addition, Service Provider must furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the Location Information unobtrusively and with a minimum of interference with its services, including by initiating a signal to determine the location of the Target Cell Phone on its network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government.

The government shall compensate Service Provider for reasonable expenses incurred in furnishing such facilities or assistance.

I find that the affidavit, or any recorded testimony, establish probable cause to permit the location search.

This warrant does not authorize the seizure of any tangible property. In approving this warrant, the Court finds reasonable necessity for the seizure of the Location Information. See 18 U.S.C. § 3103a(b)(2).

**YOU ARE COMMANDED** to execute this warrant on or before  
March 28, 2025 (not to exceed 14 days)

☐ in the daytime – 6:00 a.m. to 10:00 p.m.

☒ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is otherwise authorized, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

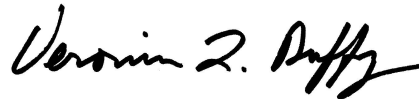
The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the undersigned Judge.

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized, for 30 days.

☐ for \_\_\_\_\_ days (*not to exceed 30*).

☐ until, the facts justifying, the later specific date of \_\_\_\_\_.

March 14, 2025 at 4:09 pm CDT at Sioux Falls, South Dakota  
Date and Time Issued



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VERONICA L. DUFFY  
United States Magistrate Judge

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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In the Matter of the Search Regarding

No. \_\_\_\_\_

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**REDACTED RETURN**

Date and time warrant executed: \_\_\_\_\_

Copy of warrant and inventory left with: \_\_\_\_\_

Inventory made in the presence of: \_\_\_\_\_

Inventory of the property taken and name of any person(s) seized (attach additional sheets, if necessary):

<b>CERTIFICATION</b>
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.
<div style="text-align: right;">_____ Special Agent Craig Scherer Homeland Security Investigations</div>

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
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25-063-04

**REDACTED AFFIDAVIT IN SUPPORT  
OF AN APPLICATION FOR A SEARCH  
WARRANT**

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I, Special Agent Craig Scherer, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c)(1)(A) for information about the location of the cellular telephone, [REDACTED] fully described in Attachment A, attached hereto and incorporated herein by reference (the “**Target Telephone**”), whose service provider is Cellco Partnership, dba Verizon Wireless, Inc., a wireless telephone service provider, headquartered at 180 Washington Valley Road, Bedminster, NJ 07921. The location information to be seized is described herein and in Attachment B, attached hereto and incorporated herein by reference.

2. I am a Special Agent with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in Sioux Falls, South Dakota and have been duly employed in this position since December 2003. I am a graduate of the Criminal Investigator Training Program and ICE Special Agent Training at the Federal Law Enforcement Training Center.

3. As a Special Agent, one of my responsibilities is investigating violations of the Immigration and Nationality Act (INA), which relates to alien’s right to enter, remain and work in the United States. [REDACTED]

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5.

[REDACTED]

**PROBABLE CAUSE**

6.

[REDACTED]

7.

[REDACTED]

8.

[REDACTED]

9.

[REDACTED]

10.

[REDACTED]

11.

[REDACTED]

12.

[REDACTED]

13.

[REDACTED]

14.

[REDACTED]

15.

[REDACTED]

16.

[REDACTED]

17.

[REDACTED]

18.

[REDACTED]

19. [REDACTED]

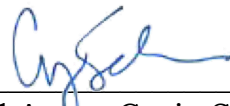
**AUTHORIZATION REQUEST**

20. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c).

21. I further request that the Court direct the Service Provider to disclose to the government any information described in Attachment A that is within its possession, custody, or control. I also request that the Court direct the Service Provider to furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the information described in Attachment A unobtrusively and with a minimum of interference with its services, including by initiating a signal to determine the location of the Target Telephone on its network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government. The government will compensate the service provider for reasonable expenses incurred in furnishing such facilities or assistance.

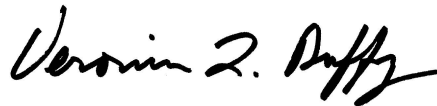
22. I further request that the information described in Attachment A be provided for the time period starting the date of issuance of the search warrant, until 30 days from the date of issuance of the search warrant.

23. I further request that the Court authorize execution of the warrant at any time of day or night, owing to the potential need to locate the Target Telephone outside of daytime hours.



Special Agent Craig Scherer  
Homeland Security Investigations

Subscribed and Sworn to me telephonically on the 14th day of March, 2025, at Sioux Falls, South Dakota.



VERONICA L. DUFFY  
United States Magistrate Judge



UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
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In the Matter of the Search Regarding: No. 4:25-mj-63  
25-063-04 **REDACTED ATTACHMENT A**

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**Property to Be Searched**

1. The cellular telephone assigned call number [REDACTED], the "Target Telephone," whose service provider is Celco Partnership, dba Verizon Wireless, Inc., a wireless telephone service provider, headquartered at 180 Washington Valley Road, Bedminster, NJ 07921.
2. Information about the location of the Target Telephone that is within the possession, custody, or control of Celco Partnership, dba Verizon Wireless, Inc., including information about the location of the cellular telephone if it is subsequently assigned a different call number.

UNITED STATES DISTRICT COURT  
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In the Matter of the Search Regarding: No. 4:25-mj-63  
25-063-04 **REDACTED ATTACHMENT B**

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**Particular Things to be Seized**

All information about the location of the Target Telephone described in Attachment A for a period of 30 days, during all times of day and night. “Information about the location of the Target Telephone” includes all available E-911 Phase II data, GPS data, Per Call Measurement Data, latitude-longitude data, and other precise location information, as well as all data about which “cell towers” (i.e., antenna towers covering specific geographic areas) and “sectors” (i.e., faces of the towers) received a radio signal from the cellular telephone described in Attachment A.

To the extent that the information described in the previous paragraph (hereinafter, “Location Information”) is within the possession, custody, or control of Cellco Partnership, dba Verizon Wireless, Inc., is required to disclose the Location Information to the government. In addition, Cellco Partnership, dba Verizon Wireless, Inc., must furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the Location Information unobtrusively and with a minimum of interference with Cellco Partnership, dba Verizon Wireless, Inc. services, including by initiating a signal to determine the location of the Target Telephone on Cellco Partnership, dba Verizon Wireless, Inc., network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government. The government shall compensate Cellco Partnership, dba Verizon Wireless, Inc., for reasonable expenses incurred in furnishing such facilities or assistance.

This warrant does not authorize the seizure of any tangible property. In approving this warrant, the Court finds reasonable necessity for the seizure of the Location Information. See 18 U.S.C. § 3103a(b)(2).